

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ORANGEBURG DIVISION

Allstate Insurance Company,)	Case No.: 8:19-cv-01082-BHH
)	
)	
Plaintiff,)	
)	
v.)	ANSWER OF DEFENDANT ZEBULON
)	YOUNG TO AMENDED COMPLAINT
)	
Lawrence R. Meadows, Roderick M.)	
Cummings, Darryl Jerome Mattison,)	
Zebulon Young, First Family Funeral)	
Home, LLC, Fred Parker, and Taras)	
Michael Parker,)	
)	
Defendants.		

Defendant Zebulon Young (“Defendant Young”) answers the Amended Complaint and respectfully asserts the following:

1. Defendant Zebulon incorporates all answers, allegations, and defenses previously asserted in response to Plaintiff’s original complaint as if fully restated and reasserted herein.
2. Each and every allegation of Plaintiff’s Amended Complaint not specifically admitted herein is denied.
3. Defendant Zebulon further answers denying any and all statements newly asserted in Plaintiff’s Amended Complaint, demanding strict proof thereof.
4. Defendant Zebulon further answers the amended complaint so as to reserve the right to assert and does not waive any additional further defenses which may be revealed by additional information that may be required in discovery or otherwise.

[Signature page to follow]

s/ Virginia W. Williams

Virginia W. Williams, Fed. Ct. I.D. 10778

David R. Williams Fed. Ct. I.D. 10651

WILLIAMS & WILLIAMS

Post Office Box 1084

Orangeburg, SC 29116-1084

Phone: (803) 534-5218

Facsimile: (803) 928-5190

williamsvw@williamsattys.com

ATTORNEYS FOR PLAINTIFF

August 12, 2019

Orangeburg, South Carolina